IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

FILED
MAY - 4 2017
CLERK, U.S. DISTRICT COURT
ALEXANDRIA, VIRGINIA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 1:17-mj-211
	)	
AAKIM RASHAAD BOTTOMS,	)	
	)	
Defendant.	)	

AFFDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Alejandro Amaya, being duly sworn, state the following:

1. I am a United States Park Police Officer assigned to District 2 substation in McLean, Virginia. I have been employed with the United States Park Police ("USPP") for approximately seven and a half years. I am a patrol officer assigned to enforce various Federal, State and local laws and regulations.

2. The information contained in this affidavit is submitted in support of a complaint charging AAKIM RASHAAD BOTTOMS with willfully and wantonly disregarding a visible or audible signal by a law enforcement officer to stop so as to interfere with the operation of the law-enforcement vehicle or endanger a person, in violation of Virginia Code § 46.2-817(B), assimilated by 18 U.S.C. § 13.

3. This affidavit is not intended to include each and every fact that occurred, but only those facts sufficient to establish probable cause for the charge set above.

4. On Wednesday, May 3, 2017, at approximately 6:48 pm, I was conducting selective enforcement north of Dead Run, around the exits to I-495, northbound on the George

Washington Memorial Parkway, a boundary of federally-owned land administered by the National Park Service, within the special maritime and territorial jurisdiction of the United States, and in the Eastern District of Virginia. I was parked in the safety zone adjacent to the exit to I-495 North and the right travel lane for the ramp to I-495 South. My police cruiser was fully marked. I was in full uniform and wearing a high visibility reflective vest with the word "POLICE" labeled on the front.

5. At or around this time, I had a vehicle stopped and was in my cruiser checking the driver's status. While waiting for the return, I looked in my driver's side mirror and observed a Burgundy Lexus SUV ("the Lexus") traveling in the left lane and approaching my location. As I observed the Lexus, I saw it cross over a solid white line that started at Dead Run Bridge. The vehicle forced its way onto the exit lane to I-495 North, causing vehicles that were in heavy traffic to stop to avoid a collision.

6. Upon observing this activity, I activated my rear emergency equipment and stepped out of the cruiser to conduct a foot stop. I pointed for the operator of the Lexus to pull his vehicle over behind my cruiser, which he was very slow to do but eventually did. I approached the passenger's side of the Lexus. I advised the driver of the Lexus, later identified as BOTTOMS, of the reason for the stop (crossing a solid white line to get into the exit lane) and requested his driver's license and registration. BOTTOMS slowly fumbled in his wallet for it.

7. During this time, BOTTOMS still had not put his car in park. After I asked him to put his car in park, BOTTOMS shifted into reverse and slowly began to reverse into traffic. I ordered him to stop. BOTTOMS then placed the car into drive and began to drive forward. I stood in front of the vehicle on the passenger side window and ordered him to stop. The Lexus nevertheless continued to approach me, and as it did, I threw my hands forward and made

contact with the passenger side mirror, knocking the mirror loose and pushing myself out of the path of the vehicle.

8. I returned to my cruiser and pursued the Lexus with my siren and lights activated for the Lexus to pull over. The Lexus did not pull over. Instead, the Lexus, with BOTTOMS driving, proceeded down the exit ramp towards I-495 and then traveled on the shoulder across the American Legion Bridge.

9. During this time, traffic conditions in the area were heavy, with traffic almost at a standstill.

10. As we got onto the American Legion Bridge, I observed a golf-ball sized plastic bag thrown out of the front passenger window of the Lexus. The bag went over the barrier and toward the river. Meanwhile, BOTTOMS continued driving on the shoulder past the Clara Barton Parkway exit into the State of Maryland. I continued to pursue him on the shoulder. After a short time, BOTTOMS began merging left and squeezed in between a car and a 53' semi-trailer, and eventually made it to the left lane. When an opening was available, I merged all the way across the interstate into the left lane. I continued to pursue BOTTOMS in this lane for a short time before he came to a stop northbound on I-495, south of River Road.

11. After he came to a stop, I put BOTTOMS under arrest and identified him through his Washington, D.C. identification card. He also had a revoked Virginia driver's license.

12. Based on the foregoing, I believe probable cause exists to charge AAKIM RASHAAD BOTTOMS with willfully and wantonly disregarding a visible or audible signal by a law enforcement officer to stop so as to interfere with the operation of the law-enforcement

vehicle or endanger a person, in violation of Virginia Code § 46.2-817(B), assimilated by 18 U.S.C. § 13.

Alejandro Amaya, Officer
United States Park Police

Sworn to and subscribed before me
this 4th day of May, 2017.

/s/
Ivan D. Davis
United States Magistrate Judge

Alexandria, Virginia